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### LOCAL BANKRUPTCY FORM 9014-3 IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Tadd E Gilleo

Debtor(s)

CHAPTER 13

U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR MERRILL LYNCH FIRST FRANKLIN MORTGAGE LOAN TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-2

Movant

IVIOVA

VS.

11 U.S.C. Section 362

NO. 23-11424 AMC

Tadd E Gilleo

Debtor(s)

KENNETH E. WEST ESQUIRE

Trustee

#### NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR MERRILL LYNCH FIRST FRANKLIN MORTGAGE LOAN TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-2 has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion, then on or before October 23, 2023 you or your attorney must do all of the following:
  - (a) file an answer explaining your position at:

United States Bankruptcy Court Robert N.C. Nix Building 900 Market Street, Suite 400 Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Bankruptcy Group KML Law Group, P.C. Suite 5000 - BNY Mellon Independence Center 701 Market Street Philadelphia, PA 19106-1532

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

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- 3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan, the United States Bankruptcy Judge, in Courtroom 4 at the United States Bankruptcy Court, Robert N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on October 31, 2023, at 11am, or as soon thereafter as counsel can be heard, to consider the motion.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Mark A. Cronin
Mark A. Cronin Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532

Phone: (215) 627-1322 Fax: (215) 627-7734

Attorneys for Movant/Applicant

October 9, 2023

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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Tadd E Gilleo

Debtor(s)

CHAPTER 13

U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR MERRILL LYNCH FIRST FRANKLIN MORTGAGE LOAN TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-2 Movant

NO. 23-11424 AMC

vs.

Tadd E Gilleo

11 U.S.C. Section 362

Debtor(s)

KENNETH E. WEST ESQUIRE

Trustee

#### **CERTIFICATE OF SERVICE**

I, Mark A. Cronin, Esq., attorney for Movant, do hereby certify that I caused true and correct copies of the foregoing Motion of U.S. BANK NATIONAL ASSOCIATION, NOT IN ITS INDIVIDUAL CAPACITY BUT SOLELY AS TRUSTEE FOR MERRILL LYNCH FIRST FRANKLIN MORTGAGE LOAN TRUST, MORTGAGE LOAN ASSET-BACKED CERTIFICATES, SERIES 2007-2 for Relief From Automatic Stay and NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE to be served on October 9, 2023, by first class mail, and/or electronic means upon those listed below:

Debtor(s)
Tadd E Gilleo
15 Dogwood Drive
Levittown, PA 19055

Attorney for Debtor(s)
Brad J. Sadek, Esq.
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
VIA ECF

Date: October 9, 2023

Trustee
KENNETH E. WEST ESQUIRE
830 Lansdowne Avenue (VIA ECF)
Drexel Hill, PA 19026
VIA ECF

Office of the US Trustee
United States Trustee
Office of the U.S. Trustee Robert N.C. Nix
Federal Building
900 Market Street Suite 320
Philadelphia, PA 19107

/s/ Mark A. Cronin
Mark A. Cronin Esquire
KML Law Group, P.C.
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Philadelphia, PA 19106-1532
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Attorneys for Movant/Applicant